

### **REMARKS**

Claims 1-6 and 8-22 are pending in the above-captioned application. Claim 7 has been cancelled. Claims 1-5 and 14-22 have been withdrawn from consideration. Claims 6 and 8 have been amended. Claims 1, 6, 14, and 16 are in independent form.

### **Specification**

Applicant has amended original paragraphs [0041] and [0042] to clarify terminology set forth in the application as originally filed. Applicant attests that no new matter has been added thereto.

### **Claims Rejections – 35 U.S.C. §103**

3-4. Claims 6, 8, 12, and 13 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 3,548,451 to Carmi et al. in view of U.S. Patent Application Publication 2002/0195736 to Potter and Japanese reference JP-2003001634 to Hirose and U.S. Patent 6,450,797 to Joseph. Applicant respectfully traverses the rejection.

Claim 6, as amended, includes the limitation of “a cavity pull system comprising an actuator, a cylinder shaft operably coupled to the actuator and extending through the fill plate, a shaft housing coupled directly to the cavity wall of the first mold portion, and a gear mechanism disposed within the shaft housing, the gear mechanism including a pinion engaging the cylinder shaft within the shaft housing and a rack pin engaging the pinion within the shaft housing, the rack pin substantially at a right angle to the cylinder shaft and extending from the shaft housing into the mold cavity, the engagement of the cylinder shaft and the pinion causing linear motion of the rack pin into the mold cavity for forming the at least one out of die draw feature.”

**None of the cited references disclose or teach a cavity pull system including an actuator, a cylinder shaft operably coupled to the actuator and extending through a fill plate, a shaft housing coupled directly to a cavity wall of a first mold portion, and a gear mechanism disposed within the shaft housing, the gear mechanism including a pinion engaging the cylinder shaft within the shaft housing and a rack pin engaging the pinion**

**within the shaft housing, as specifically required by amended claim 6.** According to the Examiner, Hirose discloses a molding device including a first rack (60) that engages a pinion (70), the pinion (70) in turn engages a second rack (50), and the second rack (50) drives the movement of an undercut mold (40). Hirose does not, however, disclose a shaft housing coupled directly to a cavity wall of a first mold portion (10). As such, the pinion (70) does not engage the first rack (60) or the second rack (50) within a shaft housing. Instead, the pinion (70) engages the first rack (60) on an outer side of a fill plate away from the cavity wall of the first mold portion (10). Therefore, claim 6, as amended, is not unpatentable in view of the cited references.

Claims 8, 12, and 13 depend from amended claim 6 and, as such, must be construed to incorporate by reference all the limitations of amended claim 6, *see* 35 U.S.C. §112, fourth paragraph. Amended claim 6 is allowable for the reasons set forth above. Thus, claims 8, 12, and 13 are also allowable.

Applicant respectfully requests, therefore, that the rejection of claims 6, 8, 12, and 13 under 35 U.S.C. §103(a) as being unpatentable over Carmi et al. in view of Potter and Hirose and Joseph be withdrawn.

5. Claims 9-11 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Carmi et al. in view of Potter, Hirose and Joseph as applied to claim 6 above, and further in view of U.S. Patent 4,114,759 to Maloney. Applicant respectfully traverses the rejection.

Claims 9-11 depend from amended claim 6 and, as such, must be construed to incorporate by reference all the limitations of amended claim 6, *see* 35 U.S.C. §112, fourth paragraph. Amended claim 6 is allowable for the reasons set forth above. Thus, claims 9-11 are also allowable.

Applicant respectfully requests, therefore, that the rejection of claims 9-11 under 35 U.S.C. §103(a) as being unpatentable over Carmi et al. in view of Potter, Hirose and Joseph as applied to claim 6 above, and further in view of Maloney be withdrawn.

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It is respectfully submitted that this patent application is in condition for allowance, which allowance is respectfully solicited. If the Examiner has any questions regarding this amendment or the patent application, the Examiner is invited to contact the undersigned.

Respectfully submitted,



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